

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EMANUEL JONES

Plaintiff,

v.

C.A. No. 06-674-SLR

OFFICER NORRIS and NEW CASTLE
COUNTY POLICE DEPARTMENT,

Defendants.

**DEFENDANTS' FIRST REQUEST FOR PRODUCTION
DIRECTED TO PLAINTIFF**

Pursuant to the Federal Rules of Civil Procedure, Defendants hereby request that plaintiff produce the following within 30 days of receipt. As used herein, documents and things shall include all types of recorded information, including but not limited to writings, drawing, graphs, charts, photographs, audio-recordings, tapes, computer printouts, and other data compilations from which information can be obtained and translated, if necessary, into reasonably useable form.

If any document required to be produced by this request is claimed by you to be not discoverable because it is privileged or for any other reason, then each such document should be identified in your response by date, sender, recipient, persons to whom copies have been furnished, and subject matter, and the basis for the claim of privilege or other reason should be stated in your response.

Please produce the following:

1. Copies of all hospital records, doctors' summaries and reports concerning any physical tests performed on or concerning the plaintiff and any other matter in writing prepared by or on behalf of any person trained in the healing arts concerning the plaintiff's past, present, or future physical condition insofar as such matters in writing may be in the possession of the plaintiff or his attorney or available to them upon request by them to any doctor, hospital or other person trained in the healing arts.

2. Copies of any and all statements, itemized bills or cancelled checks for all medical expenses, special damages, claim for lost earnings and lost earning capacity and other financial losses, allegedly incurred by the plaintiff as a result of the allegations upon which the complaint is based.

3. All written or recorded statements, descriptions of statements, summaries of statements, memoranda (signed or unsigned), of any witness or party identified herein, or their respective agents, servants or employees, including tapes or other mechanically transcribed information.

4. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.

5. Any and all documents containing the names and home addresses of all individuals contacted as potential witnesses.

6. Any and all reports compiled or prepared by an individual who has been retained as an expert in this matter.

7. The names, home and business addresses of all experts and/or consultants contacted about this matter.

8. All writings, memoranda, data and/or tangible things which relate directly or indirectly to the incident and damages set forth in plaintiff's complaint.

9. All photographs, diagrams, drawings, reports, statements, and each and every item given to or examined by experts or consultants.

10. Any and all copies of Internal Revenue Service Tax Returns for five (5) full years prior to, and all years subsequent to the date referred to in plaintiff's complaint.

11. Any and all documents, records, evidence and anything whatsoever which will be introduced at trial for use in direct examination or impeachment.

12. Any other documents, writings, memoranda, data and/or tangible things which relate directly or indirectly to the incident and/or damages set forth in the complaint in the possession of plaintiff or plaintiff's counsel.

NEW CASTLE COUNTY OFFICE OF LAW



Julie M. Sebring, Esq. – DE ID #2259
Assistant County Attorney
New Castle County Government Center
87 Read's Way
New Castle, DE 19720
(302) 395-5130
Attorney for Defendants

Dated:

7/10/07

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CERTIFICATE OF SERVICE

I, Julie M. Sebring, Esquire, hereby certify that on the 10th day of July, 2007, two copies of the Defendants' First Request for Production and First Set of Interrogatories Directed to Plaintiff were served by First Class U.S. Mail to the following:

Emanuel H. Jones - SBI# 557338
Plummer Community Corrections Center
38 Todds Lane
Wilmington, DE 19805

NEW CASTLE COUNTY OFFICE OF LAW



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